

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	
INTEL CORP. MICROPROCESSOR)	MDL Docket No. 05-1717-JJF
ANTITRUST LITIGATION)	
)	
)	
<u>PHIL PAUL, <i>on behalf of himself</i></u>)	
<i>and all others similarly situated,</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 05-485-JJF
)	CONSOLIDATED ACTION
INTEL CORPORATION,)	
)	
Defendant.)	
)	
)	

DECLARATION OF CRAIG C. CORBITT

PRICKETT JONES & ELLIOTT, P.A.

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Interim Liaison Counsel and Attorneys for Phil Paul, on
behalf of himself and all others similarly situated

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Craig C. Corbitt
Judith A. Zahid
ZELLE, HOFMANN, VOELBEL, MASON & GETTE LLP
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San Francisco, CA 94104

I, Craig C. Corbitt, declare as follows:

1. I am an attorney duly licensed by the State of California and am admitted *pro hac vice* to practice before this Court in this matter (D.I. 602 in MDL No. 05-1717). I am a partner of the law firm of Zelle, Hofmann, Voelbel, Mason & Gette, LLP ("Zelle Hofmann"). I make this declaration in support of the Motion of the Furth Firm LLP for Leave to Withdraw and for the Substitution of Zelle, Hofmann, Voelbel, Mason & Gette LLP as Interim Class Counsel. The matters set forth herein are within my personal knowledge except as to those facts which I state upon information and belief, as to which I believe them to be true. If called upon and sworn as a witness I could competently testify regarding them.

2. Zelle Hofmann attorneys have been practicing antitrust litigation and counseling individual and corporate clients for 40 years. The firm represents plaintiffs and defendants in price-fixing, monopolization, restraint of trade, and other commercial litigation, on behalf of classes, individual clients, and major corporations. The firm has a national reputation for its trial and litigation skills, as well as for resolving highly complex disputes. Zelle Hofmann has over 80 attorneys in offices located in San Francisco, Minneapolis, Boston, Dallas, and Washington, D.C., with an affiliated office in Beijing. The firm handles complex litigation and disputes on a national and international basis.

3. Zelle Hofmann is well qualified to serve as Co-Lead Class Counsel because it possess extensive experience in complex litigation and trials, and has played similar leadership roles in some of the largest antitrust class actions in this country, including several that, like this case, are technology-intensive. In the Northern District of California Zelle Hofmann was recently appointed by the Honorable Claudia Wilken as sole Lead Counsel on behalf of the Indirect-Purchaser Plaintiffs in *In re Static Random Access Memory (SRAM) Antitrust Litig.*, MDL No. 07-1819 (N.D. Cal.), by Judge Susan Illston as Co-Lead Counsel on behalf of the Indirect-Purchaser Plaintiffs in *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 07-1827 (N.D. Cal.), by Judge Sandra B. Armstrong as Co-Lead Counsel on behalf of the Indirect-

Purchaser Plaintiffs in *In re Flash Memory Antitrust Litig.*, MDL No. 1852 (N.D. Cal.), and by Judge Phyllis J. Hamilton as Liaison Counsel and member of the Executive Committee for the Indirect-Purchasers Plaintiffs in *In re Dynamic Random Access Memory (DRAM) Antitrust Litig.*, MDL 1486 PJH (N.D. Cal.). This firm has a collective depth of knowledge for litigating indirect-purchaser antitrust matters—particularly in technology industries—that is extraordinary.

4. Zelle Hofmann also successfully led litigation (including two jury trials) in several class actions against Microsoft Corporation: *Microsoft Corp. Antitrust Litig.*, No. 00-5994 (Hennepin Co. Dist. Ct., Minnesota), as Co-Lead Counsel; *Microsoft Corp. Antitrust Litig.*, No. CL 82311 (Polk Co. Dist. Ct., Iowa), as Co-Lead Counsel; *Microsoft Corp. Antitrust Litig.*, No. 05-CV-010927 (Milwaukee Co. Dist. Ct., Wisconsin), as Co-Lead Counsel; and *Microsoft Cases*, J.C.C.P. No. 4106 (San Francisco Superior Court), as Liaison Counsel and Chair of the Executive Committee. Zelle Hofmann has also been appointed to other leadership positions in antitrust class actions arising out of non-technological markets, including serving as Co-Lead Counsel in both *In re Western States Wholesale Natural Gas Antitrust Litig.*, No. 2:03-cv-01431-PMP-PAL (D. Nev.), and *Issuer Public Offering Fee Antitrust Litig.*, Nos. 98-CIV 7890 (LMM) and 00-CIV 7804 (LMM).

5. Zelle Hofmann has successfully litigated antitrust monopoly and price-fixing lawsuits on a national and international basis. Zelle Hofmann and its co-counsel in the cases listed below have achieved significant results in numerous indirect-purchaser antitrust cases, including:

- ***Microsoft Cases***, J.C.C.P. No. 4106 (San Francisco Super. Ct.), an indirect-purchaser class action on behalf of an estimated fourteen million California consumers and businesses, obtained a settlement of \$1.1 billion;
- ***Microsoft Corp. Antitrust Litigation***, No. 00-5994 (Hennepin Co. Dist. Ct., Minnesota), a class action brought on behalf of indirect purchasers of Microsoft's operating systems, word processing and spreadsheet software, obtained a settlement for over \$175 million after six weeks of trial;
- ***Microsoft Corp. Antitrust Litigation***, No. 05-CV-010927 (Milwaukee Co. Dist. Ct., Wisconsin), a class action on behalf of indirect purchasers of Microsoft's operating systems, word processing and spreadsheet software, obtained a

settlement for close to \$224 million for consumers, businesses and governmental entities;

- ***Microsoft Corp. Antitrust Litigation***, No. CL 82311(Polk Co. Dist. Ct., Iowa), a class action on behalf of indirect purchasers of Microsoft's operating systems, word processing and spreadsheet software, obtained a settlement for close to \$180 million for consumers and governmental entities after three months of trial;
- ***Sullivan, et al. v. DB Investments, Inc., et al.***, No. 04-02819 SRC (D.N.J.), a class action brought on behalf of diamond purchasers in the United States, obtained a settlement of \$272.5 million for the indirect purchasers;
- ***Smokeless Tobacco Cases I-IV***, J.C.C.P. Nos. 4250, 4258, 4259 & 4262 (San Francisco Super. Ct.), a class action brought on behalf of California consumers against manufacturers of leading brands of smokeless tobacco, with a settlement of \$96 million for a certified class of California consumers;
- ***California Natural Gas Antitrust Cases I, II, III, IV***, J.C.C.P. Nos. 4221, 4224, 4226 & 4228 (San Diego Co. Super. Ct.), a class action on behalf of California residential and commercial purchasers of natural gas, with a partial settlements totaling approximately \$160 million;
- ***In re Brand Name Prescription Drugs Antitrust Litig.***, No. 94 C 897 (N.D. Ill.), a class action on behalf of retail pharmacies, with a settlement of approximately \$700 million in cash, together with additional benefits; and
- ***In re Dynamic Random Access Memory (DRAM) Antitrust Litigation***, MDL 1486 PJH (N.D. Cal.), a nationwide class action brought on behalf of indirect purchasers of DRAM, with a partial settlement of \$82.5 million.

6. Additionally, Zelle Hofmann is routinely retained by major companies to represent them individually as opt-outs in class antitrust lawsuits, e.g., Kellogg Company, Caterpillar, Carlisle, Sara Lee and Smithfield Foods. The firm was recently retained to defend ConocoPhillips Company and a major Chinese manufacturer of Vitamin C in currently pending complex litigation class actions.

7. I will be the Zelle Hofmann partner principally responsible for this litigation. My practice specializes in complex commercial litigation for both plaintiffs and defendants at the trial and appellate levels, particularly in the areas of antitrust, trade regulation, intellectual property, securities, and contracts. Over the past twenty-five years, I have played a central role in dozens of major antitrust cases. I have also been voted a five-time "Northern California Antitrust Super Lawyer" and am a member of the Advisory Board of the American Antitrust

Institute in Washington, D.C. I am also a member of the Executive Committee of the Antitrust and Trade Regulation Section of the State Bar of California.

9. Other attorneys in the firm who will prosecute the litigation include Henry A. Cirillo, Michael Christian and Judith Zahid. Messrs. Cirillo and Christian formerly were principals with The Furth Firm LLP ("Furth") and are highly experienced antitrust trial lawyers. Mr. Cirillo has over twenty years experience. Mr. Christian has more than 10 years experience, including having served as plaintiffs' trial counsel in a class action that secured a \$175 million jury verdict. Ms. Zahid is an associate with our firm concentrating on antitrust and unfair competition cases. She has worked on the instant case from the outset and has worked with me on many major antitrust cases.

10. Attached hereto as Exhibit 1 is a true and correct copy of the Zelle Hofmann firm resume and my curriculum vitae.

11. Zelle Hofmann is ready, willing and able to assume the duties of withdrawing counsel Furth as co-interim class counsel as specified in this Court's April 18, 2006 Memorandum Order (D.I. 51 in MDL No. 05-1717), and if appointed as Class Counsel pursuant to Plaintiffs' May 16, 2008 Motion for Class Certification (D.I. 916 in MDL No. 05-1717), to serve as such. Because my colleagues and I have worked on this matter since its inception, we are familiar with the case and the issues it presents. My firm, along with others, is counsel of record for the plaintiffs in member cases *Lazio Family Products v. Intel Corporation* (No. 1:05-cv-00898-JJF) and *Law Offices of Laurel Stanley et al. v. Intel Corporation* (No. 1:05-cv-00897-JJF), both of which were filed in July of 2005.

12. Over the past three years, Zelle Hofmann has taken a very active role in the case, taking substantial responsibility for coordinating third party discovery and class certification issues, working with the expert witnesses and consultants, as well as contributing to the overall strategy and discovery planning. In particular, Zelle Hofmann has devoted substantial time and resources to third party subpoena negotiations, document review and analysis, supporting the experts with their data and document needs, and contributing to the class certification motion.

Zelle Hofmann has worked effectively and efficiently with the three firms this Court appointed as co-interim class counsel.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22nd day of August, 2008, in San Francisco, California.



Craig C. Corbitt

EXHIBIT 1



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Practice Areas

- Antitrust
- Appellate Advocacy
- Class Actions
- Complex Business Litigation
- Intellectual Property Litigation
- Securities Litigation
- Trade Regulation

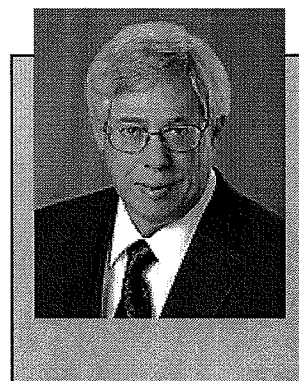
Education

- University of San Francisco, J.D., cum laude, 1978
- University of California at Davis, A.B., 1973

Bar and Court Admissions

- U.S. Supreme Court
- State Court: California
- U.S. Circuit Court of Appeals: Fifth, Seventh, Ninth, and D.C. Circuits
- U.S. District Court: Northern, Eastern, Central and Southern Districts of California, District of Arizona

Craig specializes in complex commercial litigation for both plaintiffs and defendants at the trial and appellate levels, particularly antitrust, trade regulation, intellectual property, securities, and contracts. Recently, among other matters he has represented Fortune 500 companies as plaintiffs in the Vitamins Antitrust Litigation in the District of Columbia federal court, the EPDM, CR and Rubber Chemicals synthetic rubber price fixing cases in various federal district courts, a national class of consumers in antitrust litigation against De Beers in the District of New Jersey concerning the diamond industry, and classes of California and Minnesota consumers and businesses in Microsoft Antitrust Litigation in state courts. These are among the largest antitrust cases in the country. Over the past twenty years, Craig has had a central role in dozens of major antitrust cases, including *Brand Name Prescription Drugs*, *ETSI v. Burlington Northern*, and *Southern Pacific Communications v. AT&T*.



RECENT COURT-APPOINTED POSITIONS

Liaison Counsel and Chair of Executive Committee, *Microsoft Antitrust Litigation*, California Superior Court

Co-Lead Counsel, *Pharmaceutical Antitrust Litigation*, California Superior Court

Co-Lead Counsel, *In re Western States Wholesale Natural Gas Antitrust Litigation*, District of Nevada

Co-Lead Counsel, *Initial Public Offering Fees Antitrust Litigation*, Southern District of New York

Executive Committee, *Smokeless Tobacco Antitrust Litigation*, California Superior Court

Executive Committee, *DRAM Antitrust Litigation*, Northern District of California

Liaison Counsel, *Automobile Antitrust Cases*, California Superior Court, San Francisco

Lead Counsel, *Credit-Debit Card Antitrust Litigation*, California Superior Court, San Francisco

Representative Matters

Southern Pacific Communications Co. v. AT&T, 740 F.2d 980, 1011 (D.C. Cir. 1984)

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Longden v. Sunderman , 737 F.Supp. 968 (N.D. Tex. 1990)

Anderson v. Deloitte & Touche , 56 Cal.App.4th 1468 (1997)

In re Vitamins Antitrust Litigation , 120 F.Supp.2d 58 (D. D.C. 2000)

In re Vitamins Antitrust Litigation, 2001 WL755852 (D. D.C. 2001)

In re Automobile Antitrust Cases I and II, 135 Cal.App. 4th 100 (2005)

Noteworthy

Named as an Antitrust Litigation “Super Lawyer” for Northern California 2004, 2005, 2006, 2007

AV rated by Martindale-Hubbell

Professional Affiliations

Association of Business Trial Lawyers

American Association for Justice

American Bar Association

State Bar of California

Bar Association of San Francisco

American Antitrust Institute, Advisory Board

Federal Bar Association

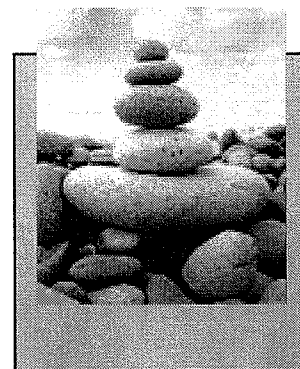
American Judicature Society

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Our Firm

Firm Overview

Zelle Hofmann is a national dispute resolution and litigation law firm with offices in Boston, Dallas, Minneapolis, San Francisco and Washington, D.C. The Firm handles complex litigation and disputes on a national and international basis. Zelle Hofmann represents both defendants and plaintiffs in its trial and dispute resolution practice. The Firm's broad litigation experience includes antitrust, banking, business torts, class action, commercial, employment, environmental, ERISA, financial services, insurance coverage, intellectual property, mass tort, mold claims, personal injury, product liability, professional liability, reinsurance, securities, subrogation-third party recovery, unfair business practice and unfair competition litigation. Zelle Hofmann is organized into groups that practice in particular areas, drawing on resources in all offices.



Zelle Hofmann concentrates on representing clients in connection with their most complex, problematic and high-risk lawsuits and legal disputes. Our balanced plaintiff-defense practice has enabled us to gain insight from both sides of the aisle in litigation. For example, our representation of plaintiffs gives us an advantage when representing a defendant, both because we know and have worked with many plaintiffs' lawyers, and because we understand the strategies undertaken in representing plaintiffs. Since our contingency practice obligates us to fund many of our clients' cases, we are particularly sensitive to the need to handle defense matters in an effective and efficient manner - at all times minimizing costs, avoiding unnecessary expenses, while doing everything to ensure the most favorable of results. We are also keenly focused on avoiding overstaffing of cases or undertaking tasks which have limited utility. Our ability to efficiently staff cases and to minimize out-of-pocket expenditures has served all our clients very well.

Areas in which Zelle Hofmann can be highly effective include the handling of particularly problematic cases and emerging issues, such as those with the potential for rulings which may have company-wide impact, high exposure cases, and other cases presenting the most difficult challenges. Our particular experience also lends itself to service as national or global managing or coordinating counsel in the direction and supervision of multiple claims by in-house claim staff and other outside counsel. In addition, with extensive experience in the antitrust area, Zelle Hofmann is well-suited to advise clients on antitrust matters and to represent plaintiffs or defendants in price-fixing, monopolization, restraint

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Our Firm

of trade, distribution and other antitrust cases, including class actions. Through our extensive experience in the intellectual property area, we are also able to help individuals and businesses protect their trademarks, copyrights, patents and other invaluable intangible assets.

The Firm has an international presence through its affiliate offices in Shanghai and Beijing, People's Republic of China, with the Chinese law firm of ZY & Partners. ZY & Partners is one of China's leading commercial law firms. It offers business consultation on a wide variety of matters, particularly to clients seeking to commence operations in China. ZY & Partners also has a rich history of representing Chinese clients, and Western clients such as The Kellogg Company, The Gap and The Walt Disney Company, before Chinese courts and administrative agencies.

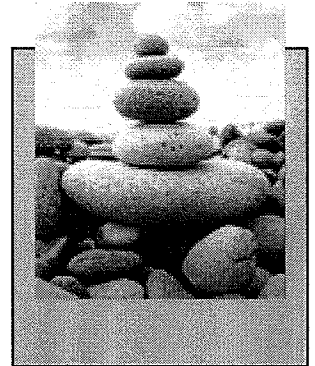
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Our Firm

Diversity Commitment

Zelle Hofmann serves global and increasingly diverse clients, who gain from the varied perspectives, creativity, innovation and energy created by a diverse and inclusive workforce. The firm is committed to maintaining an environment in which its lawyers and staff are valued for their unique backgrounds, personal characteristics, and thinking and working styles. Attracting top-quality talent is crucial to our success and we seek out such skilled individuals from a wide-spectrum of backgrounds and characteristics.

We are committed to achieving diversity through recruiting, nurturing the trust and open discussions that promote inclusiveness and experimenting with ways to enable our attorneys to achieve work-life balance while fully contributing to serving our clients.

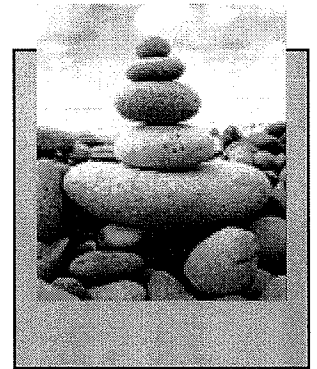


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Our Firm

Litigation Technology

Technology offers tremendous information management and control efficiencies in the litigation environment. Zelle Hofmann uses technology in strategic ways that create advantages and savings for its clients. The latest technology is employed to maximize productivity and efficiency. Our attorneys are equipped with tools allowing them to be productive and responsive wherever they may be around the world. Private extranets are employed with clients and co-counsel to enhance collaboration and minimize the cost of sharing massive amounts of information. Zelle Hofmann has a full-service Litigation Support group offering E-discovery support services, image and database repositories, trial graphics, and courtroom technology support. Zelle Hofmann maintains storage area network (SAN) technology to host multi-million page document repositories. Whereas most law firms use outside data repositories such as Case Central, Zelle Hofmann hosts massive databases internally at a fraction of the typical vendor cost. In large-scale litigation, clients can easily realize six-figure savings from Zelle Hofmann's document management approach and Zelle Hofmann attorneys realize efficiency and control benefits from such internal hosting. If you have questions about Zelle Hofmann's use of technology, contact us.



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